

Mr. John Minan, Chairman; Mr. Gary Stephany, Vice-Chair;
Board Members: Ms. Laurie Black; Ms. Janet Keller; Ms. Terese Ghio;
Mr. Eric Anderson; Mr. Richard Wright; Ms. Vickie Butcher

CC: Mr. John Robertus; Mr. Bob Morris; Mr. Jeremy Haas

Distinguished Board Members,

It was an honor to appear before you in Laguna Beach on April 9, 2003, and we wish to extend you our sincere gratitude for listening to and understanding our concerns regarding the wetlands in the Capistrano Beach area of Dana Point. Under your direction, your staff has prepared a thorough Cleanup and Abatement Order which was issued to Pioneer Builders on April 11, 2003. As you are aware that order, in part, requires the developer to immediately "initiate efforts to cleanup and abate the effects of the unauthorized discharge." To date, Pioneer had not removed any of the fill material discharged into the wetland. The order also calls for "a. Plans for restoration of no less than .066 acres of wetlands in the area where the wetlands existed prior to disturbance."

Pioneer has appealed the Cleanup and Abatement Order in an effort to negotiate the impacts to the environment and the community. These impacts are non-negotiable.

Throughout this process, the developers actions have clearly indicated that they feel the rules do not apply to them -- and that "Pioneer" will choose how and where mitigation will occur.. As recently as April 24, 2003. Mr. Douglas (as quoted in the Dana Point News), states:"They (meaning the SCRWB), want it where it was, but we can't do that, we won't do that."

Attached to this letter are 2 exhibits. Exhibit A, is the mitigation that, we understand, Pioneer is suggesting on-site. This plan is a 'slap in the face' to the community of Dana Point, State and Federal agencies and the environment. The placement of the mitigation is central and internal to their project to benefit them financially and it cuts off the wetlands from the rest of the local eco-system and wildlife corridor.

Exhibit B depicts the 'original' location of the wetlands and where it must be restored per the CAO... "Plans for restoration of no less than .066 acres of wetlands in the area where the wetlands existed prior to disturbance." The Army Corp is requiring 14,375 square feet of mitigation. Complete, onsite restoration of the Dana Point Wetland will require approximately 8500 square feet.

Members, please, you must fully support and uphold the CAO - and go one step further by requiring that the wetlands be restored to its original size and location.

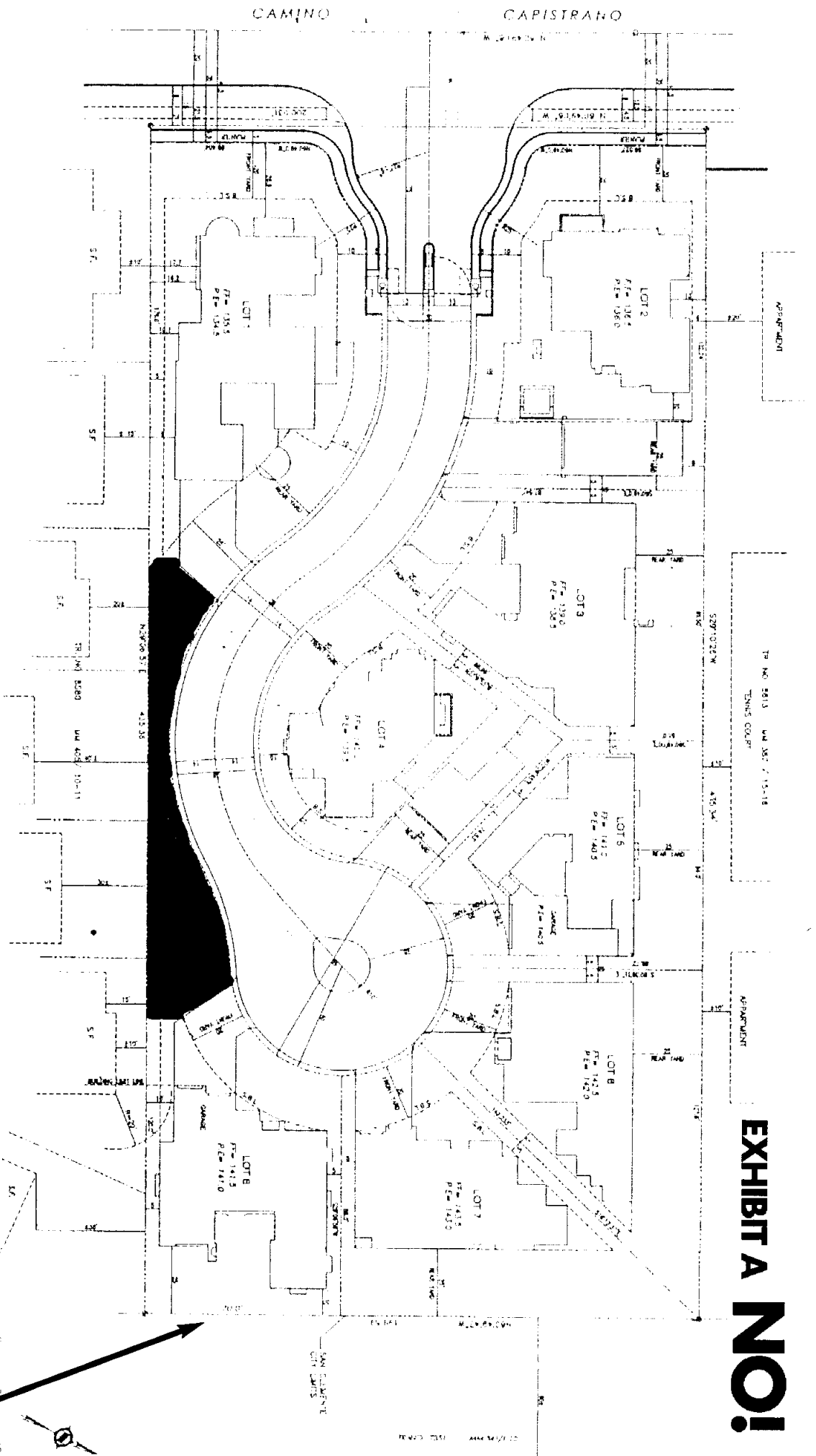
Any action otherwise, will reward the developer for this destruction and send a signal to others that this type of conduct is acceptable.

We have taken the opportunity to prepare a "chronology of events", (to the best of our ability). We hope you find this information useful in your deliberations. Attached are "cover sheets" only. Jeremy Haas is in receipt of our complete package. A review of our documentation will clearly show the intent of the developer to destroy this resource and to move brazenly forward at their own economic risk and at risk to the environment.

We must protect and restore the few small wetlands our region has left.
Please do not fail to act.

Sincerely,
Pam Tappan
Dana Point Wetlands Protection Association

EXHIBIT A NOi



PROJECT SITE PLAN

PROPOSED MITIGATION. ONLY 1800 SQUARE FEET. THIS AREA REQUIRES LANDSCAPING, REGARDLESS.

LOCAL ECO-SYSTEM AND WILDLIFE CORRIDOR
IS CUT OFF FROM THE WETLANDS.

CAMINO CAPISTRANO



100% ON-SITE RESTORATION. LOT 8 REMOVED SO WETLANDS CAN BE RESTORED AT ORIGINAL LOCATION.

PIONEER - CHRONOLOGY OF EVENTS

Project began April 17, 2001

*****We have hard copy documentation to back up every fact on these pages.**

This project first came before the Dana Point Planning Commission on April 17, 2001. The past two years has been extremely devastating for our community and the environment. I want to make it perfectly clear that we, as residents NEVER tried to stop this project. What we were asking for was to maintain some quality of life. This process requires compromise. Our neighborhood received nothing but hostility from Pioneer Builders.

The following is a list of some of the most important events of the past two years.

The enclosed artist's rendering and floor plans were drawn up before TTM or Site Plan were ever approved. The hardships that Pioneer Builders claim are self imposed and started by putting the cart before the horse.

March 26, 2001*****

ViaGeos Geotechnical Report

This report shows the presence of alluvium, hydrology, wetland indicator vegetation and mottled soils indicate the presence of a three-parameter wetland. THE DEVELOPER KNEW AT THIS TIME THAT THIS WAS A WETLANDS.

We have had to go before the Planning Commission or City Council to protect our rights eight (8) times and we still have to go before them this month. Pioneer keeps barraging the City and our neighborhood with changes which try to confuse the issue.

April 17, 2001

June 6, 2001

July 9, 2001

July 18, 2001

March 20, 2002

April 17, 2002

June 11, 2002

July 9, 2002

February 5, 2003

April 23, 2003 - Scheduled to go before City Council

Continued - Chronology of Events - Page 2

June 6, 2001

City of Dana Point **wrongfully** exempted this project from a CEQA review. The residents of Calle Anejo from the very beginning were concerned about the wetlands issue

June 22, 2001

JRV Engineering entered my property and my neighbors without permission. Measurements were taken from elevated planter boxes not pad elevation.

February 22, 2002

Second Stop Work Order regarding illegal dumping of dirt

February 25, 2002

Letter from City to remove illegal stockpile of dirt. Pioneer illegally dumped dirt three (3) separate times.

March 15, 2002

Illegal distribution of invitations. Pioneer put these invitations in the mailboxes of residents without any postage. The U. S. Postal carrier took many of them out of mailboxes.

June 4, 2002

Glenn Lukos Associates (hired by Pioneer Builders) submitted a report stating that there was NO wetlands, NO Coopers Hawks and inconsequential amounts of Coyote Brush (*Baccharis pularis*). Based on this misinformation NOT one agency was contacted.

June, 2002

Residents took their own elevations to show the City that Pioneers elevations were bogus.

June 11, 2002

Toal Engineering illegally entering neighbors yards, again. No permission was granted to Toal to take measurements.

June 11, 2002

Toal Engineering's revised elevations, showing residents numbers were correct.

Continued - Chronology of Events - Page 3

July 19, 2002

The Ed Knight, Sara Pashalides, Paul Douglas and Tony Bomkamp to make site visit verify presence of the Coopers Hawks and their three babies.

October 11, 2002

Met with Paul Douglas and Council Member Kaufman at City Hall, 5:00 PM. Mr. Douglas threatens to sue the City if he doesn't get what he wants.

October 15, 2002

Code Enforcement came and issued a stop work notice for grading without a permit. Wetlands had been grubbed. We discovered storm drain coming from San Clemente.

October 16, 2002

Doug Chokevys warns us not to get involved with the Council Members regarding the resolution that will go before them.

November 20, 2002

I went before the City of San Clemente to request that they test the storm water runoff that had been dumping onto the vacant lot for 22 years.

December 9, 2002

Letter from City of San Clemente saying they won't test water.

January 7, 2003

Dave Lund, City of San Clemente telling me to take this problem to the City of Dana Point.

January 8, 2003

Asked Pioneer to help me get the water tested.

January 10, 2003

Pioneer states that potential illnesses in our neighborhood are due to the lives we lead and the diets we maintain. He is comfortable that no alarming level of contamination will be found. He has since had this area tested, but will not give the City of Dana Point the results.

Continued - Chronology of Events - Page 4

January 22, 2003

Pioneer said I could have the water tested myself. Plus, stated that we were the cause of the wetlands. Drains from our property filling the wetlands. No drains were ever found.

January 22, 2003

Chris Means, SDRWB first agency to look at "wetlands" and water quality ordinance.

January 22, 2003 5:30 PM

Laura Crum, California Department of Fish and Game, came to the site and said it was a "wetlands". She also stated that Tony Bomkamp should have known better being he has worked with her on several occasions. He SHOULD have contacted the agencies.

January 24, 2003

Notified the City of Dana Point that Laura Crum declared this a wetlands.

January 24, 2003

Jeremy Haas visited the site and said it was a "wetlands". Also concerned about the BMP's on site.

January 24, 2003

Council Member Lacy believes that the City making this project "categorically exempt" from CEQA must have substances otherwise they would not do it so much.

January 27, 2003

Greg Gearheart rendered his unofficial opinion that this was indeed a "wetlands". Although Greg had not been to the site, he had received our packet containing photos and documents. Also, he had talked to Jeremy Haas.

January 28, 2003

Stop Work Notice was issued to Pioneer for lack of BMP's. Excavator got stuck in wetlands for over 8 hours.

January 31, 2003 Friday, 10:30 AM

Corice Farrar and Russ Kaiser, U. S. Army Corps of Engineers came to the site. Pioneer Builders and many City Officials were in attendance. No determination was made at that time.

Continued - Chronology of Events - Page 5

January 31, 2003 Approximately 11:15 AM to 11:30 AM

Terry Hirschag of Pioneer Builders came to my house and threatened to have me arrested and to bring legal action against me. I feared for my safety and reported this to the sheriff's department.

February 3, 2003

Corice Farrar e-mailed Pioneer Builders that they considered this a jurisdictional wetland and notification to the Corps prior to construction was required.

February 3, 2003

Letter from Pioneer's attorney accusing me of making a false report to State regulators. Those accusations are completely false. Threatening legal action and to cease and desist.

February 3, 2003

E-mail from Lacy relating how serious this is that the original biology report missed the wetlands issue. "Looks like Army has taken the jurisdiction on the wetland issue."

February 4, 2003

The Corps letter of Jurisdictional Determination, Enforcement Case No 200300461-CJF.

February 7, 2003

My response to Pioneer's attorney.

February 7, 2003

Barbara's response from Lacy regarding potential improprieties by the council. His apologies to our neighborhood on what we have had to go through regarding this project.

February 8, 2003

Talked to Mayor Ossenmacher, he is really upset with this project and states he felt it was a wetlands all along.

February 8, 2003

Requesting clarification as to why 20 plus conditions of Resolution No. 01-07-18-40 are being ignored and not being followed. NO RESPONSE FROM THE CITY.

Continued – Chronology of Events – page 6

February 10, 2003

My e-mail to Doug Chotkevys asking for a written position regarding the wetlands. His response was that it is now under the jurisdiction of The Corps and it is their call. We have received absolutely no support from the City of Dana Point.

February 11, 2003

Ed Knight, Director of Community Development was forced to tender his resignation.

February 14, 2003

CRWQCB issued Notice of Violation, No. R9-2003-0091 stating that Pioneer is in violation California Water Code Section, Sections 13260 & 13376 and the Water Quality Control Plan.

February 25, 2003

Corice tells Tony Bomkamp that if they present an unacceptable off-site mitigation plan, on-site mitigation would be required. THIS SHOWS THAT THE WETLANDS CAN BE RESTORED 100%.

February 27, 2003

Corps saying they are willing to reduce their calculations on the wetlands from .1 acre to .05 acre.

February 27, 2003

Scott Morgan, Governor's Office of Planning and Research. States that the City may have inappropriately used an exemption to approve this project. "Unusual Circumstances" in 15300.2 and "No Value as Habitat" from 15332.

February 28, 2003

Sara Pashalides fired (City said she was reassigned)

February 28, 2003

Asked Laura Crum if the DFG was going to weigh in on the wetlands issue. No response from her.

March 5, 2003

I was told by staff that I needed to request in writing if I wanted to see documents. Now have to demand through The Freedom of Information Act to see public documents regarding this project.

Continued - Chronology of Events - Page 7

March 6, 2003

Letter requesting to see public documents. Freedom of Information Act.

March 11, 2003

Letter from City Attorney saying they need until March 31, 2003 to get the files together.

March 14, 2003

Pioneer continues unabated on their construction site. Wondering if permits have been issued. Does CEQA need to be done to find out how much damage was done to the wetlands?

March 14, 2003

Mike Hazzard had conversation with Genia Garcia and Bob Warren. Project excepted from CEQA because everyone trusted Tony Bomkamp

March 17, 2003

Recap by Angela Duzich regarding Pioneers violating BMP's during storm.

March 18, 2003

Corps feels that a cease and desist order will not be necessary. No permits have been issued

March 19, 2003

Supervisor Wilson says he can't do anything because it is under the jurisdiction of The Corps. .

March 24, 2003

Freedom of Information request for all violations issued to Pioneer Builders regarding this project. I was told by the City Attorney, Patrick Munoz, that because of my four different request for information that I may now may get some resistance from staff. I have been asking for information on these same issues for the past six months.

March 26, 2003

Laura Crum of DFG reassigned. Donna Cobb now handling our project.

Continued - Chronology of Events - Page 8

March 31, 2003

Response from Assemblywoman Bates say that she can not do anything because it is under the Corps jurisdiction.

March 31, 2003

Letter to Susan Ramos (delivered March 32, 2003 (City stamps says that) stating my displeasure of not getting the public records.

April 1, 2003

Response from City Attorney chastising me for my attitude.

April 1, 2003

My response to the City Attorney regarding his letter.

APRIL 1, 2003

Letter from Mark Durham Showing How These Reached Their Decision on the Size of the Wetland. I am shocked to say the least that they used false information given to them by Tony Bomkamp.

April 3, 2002

Asking Doug Chotkevys for clarification of statements he has made to me. "Pam, I will consult with Hans and take the appropriate action based upon the advice of legal Counsel". Stoned walled again by the City. We don't know who to believe.

April 4, 2003

Response to Mark Durham with supporting documentation to show that the wetlands destroyed was actually much larger than .05 acre.

April 5, 2003

Sent calculations of size of wetlands done by AutoCad. Actual size is .342 acre and with mitigation of 5:1 the amount of restoration by Pioneer Builders should be 1.712 acres.

April 7, 2003

The Corps revised the size of the wetlands upward to .066 acre based on the information that we gave to them.

Continued – Chronology of Events – Page 9

April 8, 2003

U. S. Fish and Wildlife will now work with The Corps regarding this wetlands issue.

APRIL 9, 2003

Attending SDRWB in Laguna Beach asking for a Cease and Desist Order until a resolution can be reached regarding the Capistrano Beach Wetlands.

I have been told by other agencies that they will listen to you. Please correct this wrong and set a precedence for the “Full” restoration of our Capistrano Beach Wetlands

DANA POINT WETLANDS BMP'S

#1

January 22, 2002

Chris Means, SDRWB site visit. Concerned about "wetlands" and "water quality" ordinances.

#2

January 24, 2003

Jeremy Haas, site visit. Concerned about BMP's.

#3

January 28, 2003

Due to Jeremy's site visit of 1/24.03, the City of Dana Point issues a stop work notice for lack of BMP's. Photos show excavator stuck in the wetlands for over 8 hours.

PHOTO ATTACHMENTS.

#4

February 14, 2003

CRWQCB issues a Notice of Violation, No. R9-2003-0091. Pioneer is in violation of the California Water Code Section, Sections 13260 and 13376 and the Water Quality Control Plan. Discharge of Fill material into Waters of the U.S. (Dana Point Wetland). Failure to obtain 401 and 404 Permits. VIOLATION ATTACHMENT.

#5

January 3, 2003 - February 5, 2003

Wetland water carrying urban runoff to storm drain and ocean. Discharge of fill material into wetlands. PHOTO ATTACHMENTS.

#6

March 15, 16, 17, 2003

Lack of sufficient BMP's to deal with storm conditions.

Michael Hazzard, site visit. Issues formal complaint to The City of Dana Point regarding violation of SWPPP and lack of sufficient BMP's.

PHOTO ATTACHMENTS.

March 17, 2003

File memo from Angela Duzich. Regarding Michael Hazzards complaints.
MEMO ATTACHED.

March, 2003

Michael Hazzard spoke to Angela Duzich (Code Enforcement) to ask why Pioneer was not being issued violations for their lack of BMP's. Angela told Michael that the City of Dana Point was an "education", city not an "enforcement" city.

March 24, 2003

Jeremy Haas, site visit. Observes soil disturbing activities.

April 7, 2003

Notice of Violation and Request for Technical Report by SDRWQCB. Requests an NOI be submitted to Sacramento immediately. Directs Pioneer to submit a technical report by April 30, 2003. The report is to include a copy of the NOI. A copy of the Storm Water Pollution Prevention Plan. Photo verification of the BMP's that have been implemented. NOTICE OF VIOLATIONS ATTACHED.

DANA POINT WETLANDS WETLANDS OR NOT?

MARCH 2001

Pioneer begins submitting documents to City of Dana Point to obtain building permits. Photos submitted by Pioneer show the vegetation and habitat on site. PHOTOS ATTACHED.

May 2002

City Council, concerned about the sensitive habitat on site asks staff to look into wetland and habitat issues.

May 2002

Pioneer hires Glen Lukos and Associates to visit the site and file a report. BIOLOGY REPORT ATTACHED. Page 69. It is WELL documented that Cooper's Hawks nested on and used the site as habitat. Page 70. Clear signal to the developer that the DFG and the Army Corp should be contacted. Page 72. The site contained many migratory birds. Page 72 and 73. The site did and does have surface and subsurface flows that supports or has supported riparian vegetation. Our community did view this as a natural stream course.

July 2002

Residents contact Don Chadwick with the DFG. Mr. Chadwick is concerned, but he does not send DFG staff to visit the site. City staff of Dana Point assures Mr. Chadwick that the biology report supplied by the applicant suggests no wetland or wildlife impacts.

November and December 2002

Residents concerned about water quality contact the City of San Clemente, the City of Dana Point and Mr. Douglas of Pioneer Builders to express concerns about water quality.

January 22, 2003

Chris Means, SCRWB, makes site visit.

January 22, 2003

Laura Crum, DFG, makes site visit. Ms. Crum states that she believes the site contains a wetlands.

January 24, 2003

Jeremy Haas, SCRWB, makes site visit. Mr. Haas states that he believes the site contains a wetlands.

January 30, 2003

DANA POINT NEWS. "Work stuck in wetlands query". ARTICLE ATTACHED.

January 31, 2003

Army Corp of Engineers makes site visit.

February 4, 2003

Army Corp jurisdictional letter declaring the site a wetlands. LETTER ATTACHED.

February 6, 2003

DANA POINT NEWS. "Building site declared wetlands". ARTICLE ATTACHED.

February 5, 2003

City of Dana Point, Planning Commission meeting. Chairman Schoeffel asks Mr. Douglas to clear him up on the wetlands issue. Mr. Douglas, quote: "... and then the question was raised at the - actually, I think the State Water Resource Control Board was the first one involved requesting our biologist and the city's position. When we met with the Army Corps last week - it's what's called a wobbler. It could be - it couldn't be. To error on the safe side they have decided to take jurisdiction and basically it comes down to we can challenge the decision. It would cost us \$40,000 to challenge it or we can pay a fee of \$12,000 and be done with it. That's kind of the situation as of right now. Today we had a meeting with a resource attorney and he said I would like to take your business, but you are better off paying the money. It is a very, very small area we are talking about..."

February 25, 2003

Prior to February 25, 2003 Mr. Douglas continues to question the Corps jurisdiction. Email response from the Corp to Mr. Douglas, ATTACHED.

April 2003

Resident Pam Tappan speaks to Hans Vanlighten, Dana Point City Attorney. He states that the Corps case is weak and it could be easily overturned. He is advising the City of Dana Point accordingly.

April 11, 2003

CAO issued by SCRWB. CAO ATTACHED.

April 15, 2003

Letter of Jurisdiction issued by the DFG. LETTER ATTACHED.

April 24, 2003

DANA POINT NEWS. "Developer Douglas appeals order to restore creek." ARTICLE ATTACHED.

DANA POINT WETLANDS

ECOSYSTEM - CORRIDOR FOR ANIMALS

#1 - TOP OF CONDEMNED LOT - EAST SIDE

#2 - TOP OF CONDEMNED LOT - WEST SIDE

#3 - COOPERS HAWK - NEST

#4 - SAN CLEMENT CORRIDOR - VEGETATION EAST

#5 - SAN CLEMENTE CORRIDOR - VEGETATION WEST

#6 - SAN CLEMENTE CORRIDOR - TO PARK AREA

#7 - SAN CLEMENTE - MIRA COSTA PARK

#8 - PORTION OF WETLANDS BEFORE DESTRUCTION

DANA POINT WETLANDS

NATURAL WATER FLOW TO PACIFIC OCEAN

#1 - RECONSTRUCTED BLUFF - SLIDE OCCURRED JULY 13, 1994

#2 - ENTIRE DANA POINT BLUFF IS A SLIDE AREA

#3 - CULVERT DIRECTLY BELOW CONDEMNED LOT - PCH HIGHWAY

#4 - CULVER COAST SIDE PCH HIGHWAY

#5 - CONDEMNED LOT - WEST SIDE

#6 - CONDEMNED LOT - EAST SIDE

#7 - PORTION OF WETLANDS BEFORE DESTRUCTION

DANA POINT WETLANDS

Original Size

On-site Restoration

June 4, 2002

Biology report from Glen Lukos and Associates states the drainage flow is 175 feet long with varying widths of 3 to 25 feet. 2 PAGES OF THE REPORT ATTACHED.

February 4, 2003

Army Corp jurisdictional letter declaring the size of the wetlands at .1 acre, requiring a mitigation ratio of 5:1. ($.1 = 4,356 @ 5:1 = 21,780$ square feet of wetland mitigation). PAGE 2 OF THE JURISDICTIONAL LETTER ATTACHED.

February 2003

Mr. Douglas requests the Corp reduce their determination of size.

February 25, 2003

Corice Farrar, Army Corp, responds to Mr. Douglas' request for a reduction in size. The Corp reduces the impact from .1 to .05 acre. At a 5:1 ratio = .25 acre. Quote: "Furthermore, the initial proposal for on-site mitigation is insufficient to offset the impacts to waters. We would consider on-site mitigation if a surface flow and vegetative connection were re-established between the upstream flow and the vegetation corridor at the eastern border of the lot. Additionally, to achieve water benefits and limited habitat quality, the buffers should be at least 60 feet wide". EMAIL ATTACHED,

April 2003

Residents express concern regarding the reduction in the size of the determination. Residents supply the Corp with construction documents and additional information for review.

April 7, 2003

After review of the documentation, the Corp revises the length 'up' from 175 feet to 235 feet. EMAIL TO BIOLOGIST ATTACHED.

April 28, 2003

The Corp expresses concern to Mr. Bomkamp that their initial on-site mitigation plan is insufficient to provide water quality treatment benefits. Ms. Farrar goes on to state that if they "are unable to develop an acceptable off-site mitigation plan, we would require all of the mitigation to be performed on-site." EMAIL ATTACHED.

April 2003

Residents supply the Corp with more documentation in an effort to get a more accurate calculation of the size of the wetland. Residents calculations are .342 acre.

April 29, 2003

After further review of the residents documentation, the Corp revises the size 'up' from .05 to .066. Ms. Farrar states that they can only regulate a subset of the area and that is how the size was determined. EMAIL ATTACHED.

April 30, 2003

Residents were supplied with Mr. Bomkamp's field notes. After review of the notes, and an overlay of those notes on the aerial view, it is clear that the measurements are incorrect. AERIAL VIEW WITH CALCULATIONS ATTACHED.

VIOLATIONS ISSUED TO PIONEER BUILDERS

CITY VIOLATIONS AND/OR NOTICES

1. **2001** - Unauthorized stockpiling of dirt. (Reference February 22, 2002)
2. **February 22, 2002** - Stop Work Order issued - Unauthorized stockpiling of dirt.
3. **February 25, 2002** - Illegal stockpile to be removed within seven calendar days.
4. **March 9, 2002** - Stop Work Order issued - Plans had not yet been approved.
5. **October 1, 2002** - Correction Notice - 2nd Notice and third will result in stop work order being issued.
6. **October 15, 2002** - Stop Work Order - No permits on site for clearing and grubbing.
7. **January 28, 2003** - Correction Notice - Cease all grading, but can remove stuck excavator from the wetlands. This turned into a Stop Work Order that was lifted January 31, 2003. (See attached letter)
8. **March 17, 2003** - Memorandum - Recapping the BMP violations that Mike Hazzard had observed.

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD SAN DIEGO REGION

9. **February 14, 2003** - Notice of Violation No. R9-2003-0091.
10. **April 7, 2003** - Notice of Violation No. R9-2003-0147.
11. **April 7, 2003** - Notice of Violation and Request for Technical Report.
12. **April 11, 2003** - Cleanup and Abatement Order No. R9-2003-0158.

CALIFORNIA DEPARTMENT OF FISH AND GAME

13. **April 15, 2003** - Letter deferring filing a complaint with the Orange County District Attorney's office for violation of section 1603 so that U. S. Army Corps and San Diego Regional Water Quality Control Board can coordinate a solution.

U. S. DEPARTMENT OF LABOR - OSHA

14. **April 23, 2003** - Inspection 304350233, Report ID 0950631, Complaint 078429107 - Safety Violations.

U. S. ARMY CORPS OF ENGINEERS

15. **February 4, 2003** - Letter of Jurisdictional Determination Enforcement Case No. 200300461-CJF.

This list does not include the additional infractions that were handled by a verbal warning or site visit.